

EXHIBIT D

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
and JANE DOES 1 through 5,
Defendants.

Civil Action No. 04-10535 PBS

**PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS AND TANGIBLE THINGS TO DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, plaintiff Direct Report Corporation d/b/a Shareholder.com ("Shareholder.com"), requests that defendants, CCBN.com, Inc. ("CCBN") and the Thomson Corporation ("Thomson") produce each of the documents and tangible things which are specified in the "Documents Requested" identified below

Instructions & Definitions

A. Shareholder hereby incorporates by reference the instructions and definitions set forth in its First Request for Production of Documents and Things.

B. Unless otherwise stated, the following requests reference the time period 2000-2004.

C. "Information Technology Topology" means a graphical depiction of the relationship between and among individual computers interacting with CCBN's network

and/or the Internet and home computer systems. The Information Technology Topology would include logical or physical diagrams of CCBN's computer network, IP addresses, network names, and descriptions of purposes for computer systems and networks, switches, hubs, routers, gateways, virtual private networks and other remote access services, network monitoring and network traffic shaping devices.

D. "Data storage material" produced in response to the following requests should be produced in the form of a forensic image. A forensic image, also referred to as a bit-image or mirror image, is an identical representation of all data on storage media that results from the sequential capture of all available data on storage media from the beginning to the end of the entire data storage area on that media. A forensic image will include, but not be limited to, data representing any type of physical and logical partitions, file systems and file system metadata, deleted and non-deleted files and associated embedded file metadata, data from file and RAM slack, and data from other areas of data storage media considered unallocated or unpartitioned, regardless of version or duplicity.

E. "Electronic data" includes, but is not limited to, key system files, Internet cache and Internet cookie files, Internet history files, document files, database files, text files, spreadsheet files, source code and other program or script files, web page files, deleted files, binary files, encrypted files, email document files, address book files, contact information files, log files of any type, email database files, and program or software configuration and settings files.

F. "Sales cycle" means a description of the typical amount of employee time and

company resources expended to identify a potential client, market CCBN's services or products to that client, and consummate a formal revenue-producing client relationship.

Documents Requested

28. Documents sufficient to identify CCBN services or products purchased by each CCBN client listed on Appendix A from 1997 to present day.

29. Documents sufficient to identify all improvements and enhancements made to CCBN's products between 2000 to the present.

30. Documents concerning CCBN's sales cycle, including salesperson training manuals and documents describing the amount of expected lead time and costs incurred by CCBN to develop a new client relationship, from first contact or proposal to contract signing or beginning of service, between 2000 to the present.

31. Documents concerning any discounting, price incentive and/or service bundling programs offered to potential CCBN clients between 2000 to the present.

32. Documents concerning the reasons for leaving CCBN identified by clients terminating CCBN's products or services between 1997 to the present.

33. Documents identifying each company that received a sales proposal from CCBN between 2000 to the present including dates of proposals, details of terms of proposals and the result of each such proposal, including whether or not a contract was signed with CCBN.

34. Documents concerning pricing of CCBN's products and services, including CCBN product and service price lists, company policies concerning product and service pricing and analyses used to determine prices for CCBN products and services.

35. Documents describing the consolidation of CCBN's business into the financial statements of Thomson, including all notes.

36. CCBN financial statements, including all financial statements for particular product lines, from 2000 to present.

37. Documents sufficient to identify CCBN's detailed operating expenses from 2000 to present.

38. Documents concerning CCBN's classification of expenses as fixed and/or variable.

39. CCBN chart of accounts and accounting manuals from 2000 to present.

40. Business plans, marketing plans, and/or industry reports including any financial or sales growth projections, whether created by CCBN or acquired from a third party, created between 2000 and the present.

41. Documents sufficient to identify the discount and/or interest rates CCBN used for business planning purposes (e.g., hurdle rates, borrowing rates, cost of equity, or others) from 2000 to the present.

42. Documents sufficient to identify CCBN's cost of borrowing from 2000 to present.

43. Documents concerning any offers or potential offers by CCBN and/or Thomson to acquire Shareholder.com, including documents concerning valuations of Shareholder.com.

44. CCBN contracts and/or subscription agreements with the clients listed in Appendix A.

45. Agreements, including non-disclosure agreements, between Thomson or CCBN and Jeffrey Parker, Robert Adler and/or Timothy Bryan.

46. Documents concerning CCBN's Information Infrastructure Topology between 2000 and 2004.

47. Documents sufficient to identify any policies, procedures, standards or guidelines used to manage CCBN's information technology between 2000 and 2004.

48. All policies, procedures, standards, and guidelines for the use of CCBN's user authentication services, access control services, domain control services, Internet access services, public Internet Protocol address assignment services, remote access services, virtual private network services, terminal services, electronic mail services, gateway devices and services, bastian hosts, proxy devices and services, instant messaging services, or internet relay chat services applicable to the following CCBN employees or agents between 2000 and 2004:

- (a) Jeffrey Parker
- (b) Robert Adler
- (c) Timothy Bryan
- (d) direct reports to Robert Adler
- (e) consultants providing services to Robert Adler
- (f) information technology personnel providing support to Robert Adler
- (g) any employees with sales, marketing or business development responsibilities who communicated with Robert Adler

- (h) Any employees with sales, marketing or business development responsibilities with respect to the clients listed in Appendix A.

49. Data storage material concerning any CCBN log data describing a record of any successful or failed operation of a system, device, or host platform, network service provision details, or application execution and operation, hosted on any of the computer systems or electronic devices referenced in request no. 48.

50. Electronic mail data storage material from any of the computer systems or electronic devices referenced in request no. 48 concerning Shareholder.com marketing or business planning, Shareholder.com computer and communication systems, Shareholder.com clients, Shareholder.com Internet system URLs, Shareholder.com Internet system usernames and or passwords, Shareholder.com Internet system generated Cold Fusion ID's and, Cold Fusion tokens.

51. Data storage material concerning CCBN computer systems or electronic devices used for temporary or permanent data storage of any form of electronic data generated by employees identified in request no. 48 between 2000 and 2004.

52. Data storage material concerning any CCBN computer system or electronic device containing any version of AOL.com client software assigned to any personnel identified in request no. 48 between 2000 and 2004.

53. Data storage material concerning any home or mobile computer systems belonging to the CCBN employees identified in request no. 48.

54. Data storage material concerning any CCBN computer system or electronic device's interaction with the computer network of Virtual Development Inc. or the American Data Center.

55. Data storage material or electronic data concerning the use of Virtual Development Inc. or the American Data Center's services, systems or registered Internet Protocol addresses by the CCBN personnel identified in request no. 48. Electronic data responsive to this request would include file transfer service log data including but not limited to FTP (file transfer protocol), SFTP (secure file transfer protocol) or FTP over SSL (secure sockets layer).

56. All CCBN e-mail addresses, username, domain, local system, and application account identifications and passwords or pass phrases used by Robert Adler between 2000 and 2004.

57. Data storage material concerning any CCBN.com computer system or electronic device capable of storing electronic data for any computers, personal digital assistants, mobile wireless computing or telephone devices assigned by CCBN to Robert Adler between 2000 and 2004.

58. Data storage material concerning any computers, personal digital assistants, mobile wireless computing or telephone devices owned or leased by Robert Adler between 2000 and 2004.

59. The personnel files of Robert Adler, Timothy Bryan, Greg Radner, Jason Buckley, Steven Roycroft and any CCBN employee or former employee who intruded into Shareholder.com's internal computer systems.

60. Documents identifying any disciplinary action taken against any CCBN employee for engaging in corporate espionage including but not limited to the intrusion into Shareholder.com's internal computer systems.

61. Documents concerning any CCBN or Thomson Board of Director meetings at which Shareholder.com was discussed, including but not limited to minutes or notes taken at such meetings.

62. Documents concerning any meeting of CCBN management at which Shareholder.com was discussed, including but not limited to minutes or notes taken at such meetings.

63. Communications between any defendant and any third party, including but not limited to Robert Adler or his counsel, concerning this litigation.

64. Documents concerning any damages defendants allege to have incurred as a result of the conduct alleged in the counterclaims.

65. Documents describing the modifications and additions made to CCBN's Focus system from January 1, 2001 through January 1, 2004.

66. Documents provided to any expert or potential expert engaged by defendants.

67. Documents sufficient to identify all improvements and enhancements made to CCBN's internal management, administrative and support software, used to run and/or operate CCBN's day to day business between 2000 to the present.

68. Documents sufficient to identify any and all changes to CCBN's internal management, administrative and support processes and procedures, used to run CCBN's day to day business between 2000 and the present.

69. Documents sufficient to identify all problems, concerns, deficiencies, or other issues with respect to CCBN's internal management, administrative, and support software and/or processes and procedures, in the daily operation of CCBN's business between 2000 and the present.

70. Documents concerning any comparison of the use of any functionality, capability, process and/or procedure in CCBN's business with that of Shareholder.com between 2000 and the present.

71. Documents concerning any interest, plan and/or strategy by CCBN in pursuing the acquisition of Shareholder.com's business between 2000 and the present.

72. Documents concerning any interest, plan and/or strategy by CCBN in pursuing the customers and/or potential customers of Shareholder.com between 2000 and the present.

73. Documents concerning any interest by CCBN in the functional or other operation of Shareholder.com's internal communication and computer systems between 2000 and the present.

74. Documents concerning any comparison of the products and/or services offered by CCBN to customers with those similar and/or equivalent products and/or services of Shareholder.com between 2000 and the present.

75. Lists of CCBN employee names created between 2000 to the present.


76. Documents concerning the potential acquisition of CCBN, including Thomson's potential acquisition of CCBN, including any valuation of CCBN's business or assets.

77. CCBN's communications with the potential clients identified in Appendix B from the intrusion date to the present.

78. Documents identifying CCBN's Standard Industrial Classification Code(s) and related revenues, including CCBN's reports to the U.S. Census Bureau and filings made pursuant to the Hart-Scott-Rodino Act.

SHAREHOLDER.COM, INC.,

By its attorneys,



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Ruth T. Dowling (BBO #645568)
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March 1, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand on March 1, 2005.



Appendix A

1. Abbott Laboratories
2. Adaptec, Inc.
3. Administaff, Inc.
4. Advance Auto Parts, Inc.
5. Aegis Realty, Inc.
6. AeroGen, Inc.
7. Align Technology, Inc.
8. Ambac Financial Group, Inc.
9. America Online, Inc.
10. American International Group, Inc.
11. American Italian Pasta Company
12. American Medical Security Group, Inc.
13. American Mortgage Acceptance Company
14. AmerUs Group Co.
15. AMGEN, Inc.
16. APCapital [American Physicians Capital, Inc.]
17. Applied Materials, Inc.
18. Arch Chemicals, Inc.
19. Armstrong Industries [Armstrong World Industries, Inc.]
20. Avista Corporation
21. Avon Products, Inc.
22. Barnes Group, Inc.
23. Baxter International, Inc.
24. BEA Systems, Inc.
25. Bob Evans [Bob Evans Farms, Inc.]
26. Burlington Resources, Inc.
27. Cambrex Corporation
28. Career Education Corporation
29. Carreker Corporation
30. Celera Genomics [Celera Genomics Group]
31. Charter Municipal Mortgage Acceptance Co.

32. Chartered Semiconductor Manufacturing Ltd.
33. Checkpoint Systems, Inc.
34. Ciena Corporation
35. CKE Restaurants, Inc.
36. Collateral Therapeutics, Inc.
37. Comcast Corporation
38. Comcast Corporation (Media)
39. Commerce Bancshares, Inc.
40. Conectiv
41. Conectiv - Call Center
42. CoorsTek, Inc.
43. Crown American Realty Trust
44. Eastman Chemical Company
45. Enbridge, Inc.
46. Energy Partners Ltd.
47. Exabyte Corporation
48. Expedia, Inc.
49. Exponent, Inc.
50. Exxon Corp.
51. Federal Realty Investment Trust
52. FPL Group, Inc.
53. Genesco, Inc.
54. Goodyear Tire [The Goodyear Tire & Rubber Company]
55. Graphics Packaging International Corp.
56. Great American Financial [Great American Financial Resources, Inc.]
57. GTECH Corporation
58. Health Care Property Investors, Inc.
59. Hickory Tech Corporation
60. Hollywood Entertainment Corporation
61. Homestore.com, Inc.
62. Honeywell Aerospace Solutions (Allied Signal)
63. Horizon Medical Products, Inc.
64. Hughes Electronics [The DIRECTV Group, Inc.]

65. IHOP Corporation
66. Informatica Corporation
67. Integrated Device Technology, Inc.
68. Intel Corp.
69. InterNAP Network Services Corporation
70. ITT Industries
71. JLG Industries, Inc.
72. John Hancock Financial Services, Inc.
73. Kos Pharmaceuticals, Inc.
74. Kronos, Inc.
75. Lexmark International, Inc.
76. Lightbridge, Inc.
77. Lucent Technologies, Inc.
78. Manufacturer's Services Limited
79. McGrath RentCorp
80. Mediabay, Inc.
81. MedImmune, Inc.
82. Medscape, Inc.
83. Mentor Corporation
84. Mercury Computer Systems, Inc.
85. Mercury Interactive Corporation
86. Meridian Gold, Inc.
87. Millenium Chemicals, Inc.
88. Minnesota Mining and Manufacturing [3M Company]
89. Monolithic System Technology, Inc.
90. Myriad Genetics, Inc.
91. Nordstrom, Inc.
92. Northrop Grumman Corporation
93. Oakley, Inc.
94. Office Depot, Inc.
95. OM Group, Inc.
96. On Semiconductor Corporation
97. OneSource Information Services, Inc.

98. Onyx Software Corporation
99. Orient-Express Hotels Ltd.
100. PacifiCare Health Systems, Inc.
101. PDS Gaming Corporation
102. PerkinElmer, Inc.
103. Pharmacia Corporation
104. Pioneer Natural Resources Company
105. Pixar Animation Studios, Inc.
106. Progress Energy, Inc.
107. Provant, Inc.
108. Provident Investment [Provident Investment Counsel, Inc.]
109. QRS Corporation
110. Reckson Associates [Reckson Associates Realty Corp.]
111. Resmed, Inc.
112. RJ Reynolds Tobacco Holdings, Inc.
113. Saba Software, Inc.
114. Safeway, Inc.
115. SBC Communications, Inc.
116. Schlumberger Limited
117. Sciclone Pharmaceuticals, Inc.
118. Sea Containers Services LTD
119. Sonosite, Inc.
120. SPSS, Inc.
121. StanCorp Financial Group
122. State Street Corporation
123. Steris Corporation
124. Supergen, Inc.
125. Switchboard, Inc.
126. Sylvan Learning Systems, Inc.
127. Taubman [Taubman Centers, Inc.]
128. Tejon Ranch Company
129. TeraForce Technology Corporation
130. The Boston Beer Company

131. The Cooper Companies, Inc.
132. The First American Financial Corporation
133. The General Chemical Group, Inc.
134. The Manitowoc Company
135. The Reynolds and Reynolds Company
136. Toys 'R' Us, Inc.
137. Tweeter Home Entertainment [Tweeter Home Entertainment Group, Inc.]
138. Tyco International Ltd.
139. Tyco Int'l News Hot-Line
140. TyCom Ltd.
141. UniSource Energy Corporation
142. UNOVA, Inc.
143. UST, Inc.
144. Valspar Corporation
145. VaxGen, Inc.
146. Vectren Corporation
147. Washington Group International, Inc.
148. Washington Real Estate Investment Trust
149. WESCO International, Inc.
150. WGL Holdings, Inc.
151. Wind River Systems, Inc.
152. WP Carey & Co., LLC

Appendix B

1. Advance Auto Parts, Inc.
2. AeroGen, Inc.
3. American Medical Security Group, Inc.
4. APCapital [American Physicians Capital, Inc.]
5. Cambrex Corporation
6. Carreker Corporation
7. CKE Restaurants, Inc.
8. Commerce Bancshares, Inc.
9. Conectiv - Call Center
10. Enbridge, Inc.
11. Exponent, Inc.
12. Exxon Corp.
13. Genesco, Inc.
14. Graphics Packaging International Corp.
15. Great American Financial [Great American Financial Resources, Inc.]
16. GTECH Corporation
17. Honeywell Aerospace Solutions (Allied Signal)
18. ITT Industries
19. McGrath RentCorp
20. Mentor Corporation
21. Mercury Computer Systems, Inc.
22. Meridian Gold, Inc.
23. Millenium Chemicals, Inc.
24. Minnesota Mining and Manufacturing [3M Company]
25. On Semiconductor Corporation
26. PerkinElmer, Inc.
27. Pharmacia Corporation
28. Pixar Animation Studios, Inc.
29. Provident Investment [Provident Investment Counsel, Inc.]
30. SBC Communications, Inc.
31. Sonosite, Inc.

32. SPSS, Inc.
33. Steris Corporation
34. Supergen, Inc.
35. TeraForce Technology Corporation
36. Tyco International Ltd.
37. Tyco Int'l News Hot-Line
38. TyCom Ltd.
39. UNOVA, Inc.
40. Vectren Corporation
41. WESCO International, Inc.
42. Wind River Systems, Inc.
43. WP Carey & Co., LLC